

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

FREDERIC Z. HENSLEY and DIANNE R. HENSLEY,)	C/A No. 2:15-cv-02087-ASB
)	
)	
Plaintiffs,)	
)	
v.)	<u>MOTION TO AMEND COMPLAINT</u>
)	<u>PURSUANT TO RULES 15(a) AND</u>
)	<u>25(a)(1) OF THE FEDERAL RULES OF</u>
3M COMPANY, et al.,)	<u>CIVIL PROCEDURE</u>
)	
Defendants.)	
_____)	

COMES NOW Plaintiff who moves this Court for leave to file an Amended Complaint to substitute DIANNE R. HENSLEY, Personal Representative of the Estate of FREDERIC Z. HENSLEY, deceased, as Plaintiff, and to add as a separate and distinct cause of action, Plaintiff's claim for relief pursuant to the South Carolina Wrongful Death Statute, §15-51-10 et seq. of the S.C. Code of Laws. This motion is made upon the grounds that FREDERIC Z. HENSLEY died on April 18, 2015, and Dianne R. Hensley was duly appointed Personal Representative of the Estate of FREDERIC Z. HENSLEY on May 5, 2015. The grounds for said motion are more fully set forth in the attached Affidavit and Memorandum.

Respectfully submitted this 3rd day of June, 2015

MOTLEY RICE LLC

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